



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Forest Service Response

Reply To
Attn Of: ETPA-O88

Ref: 03-046-AFS

Steve E. Williams, Acting Supervisor U.S. Forest Service
Nez Perce National Forest
Route 2, Box 475 / Grangeville, ID 83530

Dear Mr. Williams:

The U. S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (EIS) for Red Pines Project (CEQ No. 20050304) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions and the document's adequacy in meeting NEPA requirements.

The EIS proposes to implement fuel reduction activities and a range of watershed improvement activities in the Red River watershed of the Nez Perce National Forest. The Red Pines Project would treat existing and potential fuel loads to reduce the effects of potential large-scale wildfire by removing dead and dying trees, reducing timber stand densities, reducing ladder fuels and maintaining fire-resistant tree species. These activities would move the project area toward the desired future condition (DFC) as defined in the Nez Perce National Forest Land and Resource Management Plan (Forest Plan).

The EIS identifies four action alternatives and Alternative B as the Proposed Action. Alternative E was developed in response to public comments to the draft EIS regarding water quality and fish habitat conditions. This new alternative would reduce the amount of fuels reduction through timber harvest, including within riparian habitat conservation areas.

We continue to support the overall objectives of the watershed improvement activities proposed in the EIS and we recommend the US Forest Service implement actions proposed in Alternative E. The obliteration and maintenance of roads, channel reconstruction, riparian planting and stream crossing upgrades, when conducted properly, should provide some significant long term improvements to the watersheds in the Red Pines project area.

Response 2-1. Comment acknowledged.

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We appreciate the additional information provided in the Cumulative Effects section of the EIS and the additional analyses addressing water quality and fisheries impacts.

However, we still have concerns with the Proposed Action's (Alternative B) potential for increases in sediment delivery to waterbodies, compliance with water quality standards and the Total Maximum Daily Load (TMDL) for the South Fork Clearwater River, and impacts on Endangered Species Act (ESA) listed salmonids.

We support your consultation efforts with Idaho Department of Environmental Quality (IDEQ) regarding compliance with water quality standards and the South Fork Clearwater River TMDL. We ask that you keep us informed of the outcome of these consultations and their impacts on the implementation of proposed project actions.

Thank you for the opportunity to review this EIS. If you would like to discuss these issues, please contact Mike Letourneau at (206) 553-6382.

Sincerely,

/s/Christine B. Reichgott

Christine Reichgott, Manager NEP A Review Unit

Response 2-2. Cumulative Effects, effects analysis fish & water quality.
Comment acknowledged.

Response 2-3. Alternative B- Proposed Action.
The preferred and selected alternative is Alternative E.

Response 2-4. Consultation with IDEQ.
Please see FEIS Comment Letter #1 regarding IDEQ's comments and consultation.